

***Remarks***

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-5 and 7-10 are pending in the application, with claims 1 and 8-10 being the independent claims. Claim 6 has been cancelled without prejudice to or disclaimer of the subject matter therein.

Claims 1-7 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,481,432 to Tsukada *et al.* (hereinafter “Tsukada”). Claims 8 and 10 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,600,783 to Kakuta *et al.* (hereinafter “Kakuta”). Claim 9 stands rejected under 35 U.S.C. § 102(b) as being anticipated by Kakuta.

Based on the above amendment and the following Remarks, Applicant respectfully requests that the examiner reconsider all outstanding objections and rejections and they be withdrawn.

I. Claims 1-5 and 7 Are Patentable Over Tsukada

Claims 1-5 and 7 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Tsukada. For the following reasons, this rejection is respectfully traversed.

Claim 1 recites “an electronic data storage apparatus for use in connection with an electronic data processing device comprising a removable substrate configured for selective installation in said data processing device.”

Tsukada discloses a system that allows for an entire computer to be inserted into and removed from peripheral equipment (*see* col. 1, ll. 9-12). All of the computer components (including a processing device 55 and a storage device 60) are mounted on a circuit board 340 which is enclosed within the computer (*see* col. 6, line 41 to col. 7, line 22).

Tsukada does not disclose or suggest “a removable substrate configured for selective installation in said data processing device,” as recited in claim 1. While Tsukada may disclose that the computer and all of its components are collectively portable and may be collectively inserted into and removed from peripheral systems, Tsukada does not disclose or suggest that the circuit board 340 alone may be selectively installed *in* the processing device 55 because the

processing device 55 *is mounted on* the circuit board 340 (*see* FIGS. 2, 3 and 13). Therefore, it is not possible for the circuit board 340 to be selectively installed *in* the processing device 55, as recited in claim 1 of the present invention.

Because Tsukada fails to disclose or suggest the claimed apparatus including “an electronic data storage apparatus for use in connection with an electronic data processing device comprising a removable substrate configured for selective installation in said data processing device,” claim 1 is allowable over Tsukada. Claims 2-5 and 7 depend from claim 1 and are allowable for at least these reasons. Therefore, the Applicant respectfully requests that the Examiner withdraw the rejection of claims 1-5 and 7.

#### IV. Claims 8-10 Are Patentable Over Kakuta

Claims 8 and 10 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Kakuta. Claim 9 stands rejected under 35 U.S.C. § 102(b) as being anticipated by Kakuta. For the following reasons, these rejections are respectfully traversed.

Claim 8 recites “a plurality of substrates, wherein each of said substrates is configured for selective installation in said electronic data processing device . . . [and] a controller mounted on at least one of said plurality of substrates for controlling the transfer of data to and from said at least one electronic data storage devices mounted on each of said substrates.” Claim 9 recites “a removable substrate . . . [and] a controller mounted on said substrate for controlling the transfer of data to and from said data storage device and for controlling the transfer of data to and from said processing unit.” Claim 10 recites “a substrate adapted for selective insertion into a chassis . . . [and] a controller mounted on said substrate for controlling the transfer of data to and from said at least one first electronic data storage device.” Therefore, each of claims 8-10 recite a controller mounted on a substrate whereby the substrate is either removable or adapted for selective insertion into a chassis.

Kakuta discloses a computer system having a CPU 1, an array controller 2, and a plurality of drive boards 5A (*see* FIG. 1). At least one disc drive 5 is mounted on each of the drive boards 5A (*see* FIG. 1) and each drive board 5A is connected to the array controller 2 via bus 37 (*see*

col.4, ll.37-52). Each of the drive boards 5A may be detached from the bus 37 for repair or replacement (*see* col.5, ll.4-15). When the drive boards are attached to bus 37, the array controller 2 controls the transfer of data to and from each individual drive board 5A and any disc drive 5 mounted thereto (*see* FIG. 3 and col.5, ll.55-64). Therefore, each drive board 5A, and thus each disc drive 5, are controlled by a central controller 2 mounted within the main chassis of the computer system.

Kakuta does not disclose or suggest a controller mounted on a removable substrate, as recited in claims 8 and 9, or on a substrate adapted for selective insertion into a chassis, as recited in claim 10. While Kakuta may disclose that the drive boards 5A, upon which disc drives 5 may be mounted, are removable from the main chassis of the computer, Kakuta does not disclose or suggest that the controller may be mounted on any of the drive boards. In fact, Kakuta teaches away from mounting a controller on the drive boards because Kakuta utilizes a central controller 2 for controlling the transfer of data to and from each of the drive boards 5A when they are inserted into the main chassis of the computer system (*see* col.5, ll.4-15).

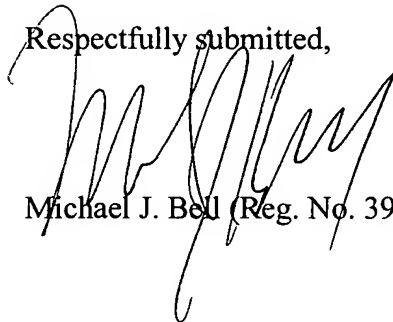
Because Kakuta fails to disclose or suggest the claimed apparatus as recited by claims 8-10, claim 8-10 are allowable over Kakuta. Therefore, the Applicant respectfully requests that the Examiner withdraw the rejections of claims 8-10.

***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. The Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicant believes that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael J. Bell', is written over the typed name.

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